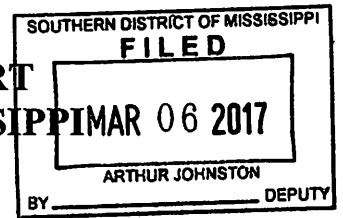


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**



DOUGLAS HANDSHOE)

v.)

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &)
DANIEL ABEL, D/B/A/ TROUT)
POINT LODGE LTD OF NOVA SCOTIA)
& IN THEIR INDIVIDUAL CAPACITIES)
PROGRESS MEDIA GROUP LIMITED,)
MARILYN SMULDERS, & ASHOKA)

**OPPOSITION TO VAUGHN PERRET AND CHARLES LEARY'S MOTION TO
DISMISS**

Plaintiff opposes the Motion to Dismiss filed by Vaughn Perret and Charles Leary for the reasons stated in the Memorandum of Law in Support of Plaintiff's Opposition to Perret and Leary's Motion to Dismiss being filed at the same time as this response.

The following exhibits are attached to this Opposition:

1. Affidavit of Douglas Handshoe As Exhibit 1
2. Document 73, Case 1:12-cv-00090-LG-JMR Filed 06/09/16 by the Defendants. (Exhibit A to Affidavit)
3. Document 00513686769, Case16-60508 Filed 09/20/2016 by the Defendants (Exhibit B to Affidavit)
4. Screen Capture of Parody Video created and owned by Slabbed New Media, LLC hosted by YouTube and located at https://www.youtube.com/watch?v=M_pc4bjaLno. (Exhibit C to Affidavit)

5. United States Copyright Office Certificate of Registration NO PA 2-019-025 of video hosted by Youtube and located at https://www.youtube.com/watch?v=M_pc4bjaLno.
(Exhibit D to Affidavit)
6. Court Stamped "Amended Notice of Application in Court" dated February 8, 2013
(Exhibit E to Affidavit)
7. Court Stamped (As true copy) Affidavit dated January 23, 2013 which accompanied the Amended Notice of Application in Court" (Exhibit F to Affidavit)
8. YouTube Terms of Service dated June 9, 2010 (Exhibit G to Affidavit)
9. HostGator DMCA Policy (Exhibit H to Affidavit)
10. Dream Host DMCA Policy (Exhibit I to Affidavit)
11. "A day in the life of Trout Point Lodgers Chuck and Vaughn" by Slabbed New Media dated March 30, 2013. (Exhibit J to the Affidavit)

Respectfully submitted this 6th day of March, 2017,



Plaintiff
Douglas Handshoe
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earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on March 6, 2017 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

Respectfully submitted this 6th day of March, 2017,



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